

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

Case No.: 3:16-cv-01735-D

**CHRISTOPHER A. FAULKNER,
BREITLING ENERGY CORPORATION,
JEREMY S. WAGERS,
JUDSON F. (“RICK”) HOOVER,
PARKER R. HALLAM,
JOSEPH SIMO,
DUSTIN MICHAEL MILLER RODRIGUEZ,
BETH C. HANDKINS,
GILBERT STEEDLEY,
BREITLING OIL & GAS CORPORATION,
CRUDE ENERGY, LLC,
PATRIOT ENERGY, INC.,**

Defendants,

and

**TAMRA M. FREEDMAN and
JETMIR AHMEDI,**

Relief Defendants.

§

**UNOPPOSED MOTION TO ENTER FINAL JUDGMENT
AGAINST DEFENDANT JEREMY S. WAGERS**

Plaintiff Securities and Exchange Commission (“Commission”) files this Unopposed Motion to Enter Final Judgment against Defendant Jeremy S. Wagers (“Defendant”), and respectfully shows the Court as follows:

1. The Commission filed this civil action on June 24, 2016, *inter alia*, asserting that Defendant committed violations of the federal securities laws. *See* Dkt. No. 1. On August 11, 2016, the Commission filed its First Amended Complaint. *See* Dkt. No. 22.

2. The Commission has reached a settlement with Defendant. Defendant has executed a written consent (the “Consent”) that sets out the terms of the agreement. *A true and correct copy of the Consent is filed herewith as Exhibit A.* Under the terms of the Consent, Defendant consents to the entry of a Final Judgment. *A true and correct copy of the Final Judgment is attached hereto as Exhibit B.*

3. Under the terms of the Consent, Defendant, *inter alia*: (a) acknowledges having been served with process; (b) acknowledges having made a general appearance; (c) admits the Court’s jurisdiction over him and over the subject matter of this action; and (d) consents to the entry of the Final Judgment.

4. As set forth in the Final Judgment, Defendant, *inter alia*:

- (a) consents to entry of the Final Judgment without admitting or denying the allegations in the First Amended Complaint except as noted in the Final Judgment;
- (b) waives findings of fact and conclusions of law;
- (c) waives any right to appeal from the Final Judgment;
- (d) is permanently restrained and enjoined from violating, directly or indirectly:
 - (1) Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5];

- (2) Section 14(a) of the Exchange Act [15 U.S.C. § 78n(a)] and Rule 14a-9 thereunder [17 C.F.R. § 240.14a-9];
 - (3) Rule 13b2-1 of the Exchange Act [17 C.F.R. § 240.13b2-1]; and
 - (4) Rule 13b2-2 of the Exchange Act [17 C.F.R. § 240.13b2-2];
- (e) is permanently restrained and enjoined from aiding and abetting any violation of:
- (1) Section 13(a) of the Exchange Act [15 U.S.C. § 78m(a)] and Rules 12b-20, 13a-1, 13a-11, or 13a-13 thereunder [17 C.F.R. §§ 240.12b-20, 240.13a-1, 240.13a-11, and 240.13a-13]; and
 - (2) Section 13(b)(2)(A) and 13(b)(2)(B) of the Exchange Act [15 U.S.C. §§ 78m(b)(2)(A) and 78m(b)(2)(B)];
- (f) is prohibited for five years from the date of the entry of the Final Judgment from:
- (1) acting as an officer or director of any issuer that has a class of securities registered pursuant to Section 12 of the Exchange Act [15 U.S.C. § 78l] or that is required to file reports pursuant to Section 15(d) of the Exchange Act [15 U.S.C. § 78o(d)]; and
 - (2) participating, directly or indirectly, in the issuance, purchase, offer, or sale of any unregistered securities, provided however that such injunction shall not prevent him from purchasing or selling securities for his own personal account;
- (g) is liable for disgorgement in the amount of \$74,825 plus prejudgment interest thereon in the amount of \$11,396.15; and
- (h) is liable for a civil penalty in the amount of \$250,000.

5. The Final Judgment disposes of all issues in the Commission's case against Defendant. However, as set forth in the Final Judgment, this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms in the Final Judgment.

6. Thus, the Commission respectfully asks the Court to enter the Final Judgment consented to by Defendant.

Dated: March 14, 2019

Respectfully submitted,

s/ Jason Reinsch
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ATTORNEYS FOR PLAINTIFF
SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF CONFERENCE

Pursuant to the attached Consent, Defendant agrees that the Commission may, without further notice, present the Final Judgment to the Court for entry. *See Exhibit A at ¶ 15.*

/s/ Jason Reinsch
JASON REINSCH

CERTIFICATE OF SERVICE

I affirm that on March 14, 2019, I electronically filed the foregoing Motion with the Clerk of the Court for the Northern District of Texas, Dallas Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants, constituting service as provided in LR 5.1 (d).

I further certify that on March 14, 2019, I served a true and correct copy of the foregoing document on the following parties and persons entitled to notice that are non-CM/ECF participants:

Michael P. Gibson (via UPS and E-mail) Burleson, Pate & Gibson, LLP Founders Square 900 Jackson St., Suite 330 Dallas, TX 75202 mgibson@bp-g.com <i>Counsel for Defendant Beth C. Handkins</i>	Alex More (Requested e-mail service only) Carrington Coleman 901 Main St., Suite 5500 Dallas, TX 75202 amore@CCSB.com <i>Counsel for Defendant Gilbert R. Steedley</i>
Christopher A. Faulkner (via Certified mail, return receipt requested) Register No. 76501-112 FCI Seagoville Federal Correctional Institution P.O. Box 9000 Seagoville, TX 75159 <i>Pro Se Defendant</i>	Jeremy S. Wagers (via UPS) 23381 McCrory Road Navasota, Texas 77868 jwagers@wagerslaw.com <i>Pro Se Defendant</i>

/s/Jason Reinsch
JASON REINSCH